

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

<b>UNITED STATES OF AMERICA</b>	)	Criminal No. 5:20-cr-00298-DNH
	)	
<b>v.</b>	)	
	)	
<b>JOHN ZOURDOS,</b>	)	
<b>HELEN ZOURDOS, and</b>	)	
<b>DIMITRIOS ZOURDOS</b>	)	
	)	
<b>Defendants.</b>	)	

**GOVERNMENT'S PROPOSED VERDICT FORM AS TO DIMITRIOS ZOURDOS**

Dated: October 22, 2021

Respectfully submitted,

DAVID A. HUBBERT  
Acting Assistant Attorney General

/s/ John N. Kane

By:

\_\_\_\_\_  
John N. Kane  
Assistant Chief  
U.S. Department of Justice, Tax Division  
Northern Criminal Enforcement Section  
Bar Roll No. 515130

CARLA B. FREEDMAN  
United States Attorney

/s/ Michael F. Perry

By:

\_\_\_\_\_  
Michael F. Perry  
Assistant United States Attorney  
Bar Roll No. 518952

We, the jury, unanimously find as follows as to the Defendant, **DIMITRIOS ZOURDOS**:

**COUNT 1**  
**Conspiracy to Defraud the United States**  
**[18 U.S.C. § 371]**

1. As to Count 1 of the Indictment, we, the Jury, unanimously find the Defendant, **DIMITRIOS ZOURDOS**:

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 2**  
**Tax Evasion**  
**[26 U.S.C. § 7201 & 18 U.S.C. § 2]**

2. As to Count 2 of the Indictment, we, the Jury, unanimously find the Defendant, **DIMITRIOS ZOURDOS**:

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 3**  
**Tax Evasion**  
**[26 U.S.C. § 7201 & 18 U.S.C. § 2]**

3. As to Count 3 of the Indictment, we, the Jury, unanimously find the Defendant, **DIMITRIOS ZOURDOS**:

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 4**  
**Tax Evasion**  
**[26 U.S.C. § 7201 & 18 U.S.C. § 2]**

4. As to Count 4 of the Indictment, we, the Jury, unanimously find the Defendant, **DIMITRIOS ZOURDOS**:

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 5**  
**Tax Evasion**  
**[26 U.S.C. § 7201 & 18 U.S.C. § 2]**

5. As to Count 5 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 6**  
**Tax Evasion**  
**[26 U.S.C. § 7201 & 18 U.S.C. § 2]**

6. As to Count 6 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 7**  
**Tax Evasion**  
**[26 U.S.C. § 7201 & 18 U.S.C. § 2]**

7. As to Count 7 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 8**  
**Tax Evasion**  
**[26 U.S.C. § 7201 & 18 U.S.C. § 2]**

8. As to Count 8 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 9**

**Aiding and Assisting in the Preparation of False Tax Returns**  
**[26 U.S.C. § 7206(2)]**

9. As to Count 9 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 10**

**Aiding and Assisting in the Preparation of False Tax Returns**  
**[26 U.S.C. § 7206(2)]**

10. As to Count 10 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 11**

**Aiding and Assisting in the Preparation of False Tax Returns**  
**[26 U.S.C. § 7206(2)]**

11. As to Count 11 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 12**

**Aiding and Assisting in the Preparation of False Tax Returns**  
**[26 U.S.C. § 7206(2)]**

12. As to Count 12 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 13**

**Aiding and Assisting in the Preparation of False Tax Returns  
[26 U.S.C. § 7206(2)]**

13. As to Count 13 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 14**

**Aiding and Assisting in the Preparation of False Tax Returns  
[26 U.S.C. § 7206(2)]**

14. As to Count 14 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

**COUNT 15**

**Aiding and Assisting in the Preparation of False Tax Returns  
[26 U.S.C. § 7206(2)]**

15. As to Count 15 of the Indictment, we, the Jury, unanimously find the Defendant,  
**DIMITRIOS ZOURDOS:**

\_\_\_\_\_  
Guilty

\_\_\_\_\_  
Not Guilty

*WHEN YOU HAVE COMPLETED THE VERDICT SHEET, THE FOREPERSON SHOULD SIGN  
AND DATE IT AND THEN ALERT THE ASSIGNED MARSHAL.*

So say we all,

Dated: \_\_\_\_\_

\_\_\_\_\_  
Foreperson